

Honorable David G. Estudillo

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

MATTHEW GREENWOOD,

Defendant.

NO. CR23-5097 DGE

UNITED STATES' SENTENCING
MEMORANDUM

I. Introduction.

On Christmas Eve 2022, Matthew Greenwood and Jeremy Crahan attempted to execute their plan to knock the power out by damaging electrical substations and then, taking advantage of the darkness and outage, to burglarize local businesses and ATM machines. During the early morning hours of Christmas Day, they broke into and damaged three substations, knocking the power out for thousands of local community members in the dead of winter. They took a break during the daylight and then, at about 7:30 p.m., attacked a fourth substation. Following this, they burglarized a local restaurant and stole a small amount of money from the cash register. In the end, Greenwood and Crahan caused a total of \$235,699 in damage to the four substations and power outages for over 15,500 customers.

II. The Sentencing Guidelines Calculations.

The government concurs with the Sentencing Guidelines calculations in the Presentence Report. Specifically, there is a total offense level of 14 and a criminal history category of IV, resulting in an advisory Guidelines range of 27-33 months.

III. Sentencing Recommendation.

For the reasons set forth herein, the government joins the U.S. Probation Office in recommending that the Court impose a sentence of probation for three years with six months of home confinement and the rest of the conditions of probation listed in the Presentence Report. The various statutory sentencing factors support this sentence, including the nature and circumstances of the offense; the need for the sentence imposed to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment; and the history and characteristics of the defendant.

A. The Nature and Circumstances and Seriousness of the Offense.

Greenwood's offenses were extremely serious. In furtherance of their plan to commit a series of burglaries, he and Crahan broke into and damaged four electrical substations, knocking the power out for thousands of community members on Christmas Day and causing extensive financial damage. This conduct showed a disregard for the community and a terrible lack of judgment. Moreover, damaging this sort of sophisticated electrical equipment is extremely dangerous; it is fortunate that no one was injured because of these crimes, including the defendants themselves. *See* PSR ¶ 11 (noting that the Kapowsin substation equipment was "arcing and sparking").

Greenwood's conduct was particularly aggravated for two reasons. First, he and Crahan sabotaged the fourth substation more than 13 hours after the first three attacks, following a substantial "cooling off" period and after extensive press coverage about the power losses caused by the earlier incidents. *See* PSR ¶¶ 9-11 (the attacks took place at 2:39 a.m., 5:30 a.m., 6:00 a.m., and 7:25 p.m.). Nonetheless, Greenwood went back out with Crahan and attacked the fourth substation, causing thousands more customers to lose power. Second, even after the attacks on Christmas Day, Greenwood and Crahan

1 continued with their plan to cause power outages in furtherance of burglaries. During the
2 following days, FBI agents conducted surveillance of both men and observed them
3 lurking late at night in the vicinity of additional rural power stations. Greenwood
4 admitted in the sworn factual statement in his Plea Agreement that they intended to fell
5 trees to knock out the power. Plea Agreement at 5 (Dkt. 56).

6 **B. Greenwood's Background and Characteristics.**

7 Several aspects of Greenwood's background are mitigating and serve as the
8 primary basis for the government's probationary recommendation.

9 First and foremost, Greenwood's conduct while on pretrial release is impressive
10 and commendable. As noted in the Presentence Report, he moved to Spokane to
11 disassociate with various negative influences in the Pierce County area, he successfully
12 underwent inpatient drug treatment, has been sober for a full year, is raising a new baby
13 girl with his long-term girlfriend, and has had no bond violations. This is particularly
14 important because Greenwood has had methamphetamine substance abuse issues for
15 many years, which was the primary cause of his criminal activity in this and past cases.
16 The fact that he has been sober now for more than a year bodes very well for
17 Greenwood's future. As does the fact that he has gainful and consistent employment and
18 a newfound motivation to live a law-abiding life in the form of his daughter. Although
19 Greenwood's criminal conduct was extremely serious and deserving of a custodial
20 sentence, the government agrees with the Probation Office that derailing the progress he
21 has made during the past year by imposing a jail term is not in the interests of justice.

22 Second, Greenwood's upbringing was extremely difficult and full of challenges
23 that no one should be forced to endure. As reflected by his nearly top-end ACE score, he
24 suffered verbal abuse, physical abuse, and emotional neglect at the hands of the very
25 people who should have nurtured him. His upbringing directly contributed to his ultimate
26 abuse of methamphetamine which, in turn, led to his criminal activities.

C. Greenwood' Proffer Interview with the Government.

The government is also mindful that Greenwood assisted the government by agreeing to a proffer interview about his offense conduct. Among other things, this enabled the government to rule out any potential domestic terrorism/ideological motive for the offenses in this case. Greenwood was fully truthful during this interview. After the interview, co-defendant Jeremy Crahan entered a guilty plea in his related case.

IV. Conclusion.

For all these reasons, the government submits that the appropriate sentence in this case is a sentence of probation for three years with six months of home confinement and the rest of the conditions of probation listed in the Presentence Report.

DATED this 11th day of January, 2024.

Respectfully submitted,

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